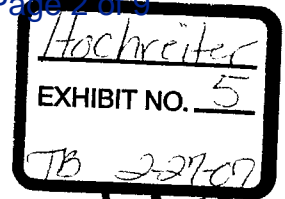


# **EXHIBIT “C”**



American Cyanamid Company  
One Cyanamid Plaza  
Wayne, NJ 07470-8426



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VIA FEDERAL EXPRESS

July 2, 1993

Joan E. Martin-Banks  
U.S. Environmental Protection Agency  
PRP Search Section (3HW11)  
841 Chestnut Building, 9th Floor  
Philadelphia, PA 19107

Re: Boarhead Farms Site, Bridgeton Township, PA

Dear Ms. Billings:

This letter is submitted in response to your correspondence of May 26, 1993. Cyanamid has conducted a diligent search of files and contacted persons with knowledge and operations at the Bound Brook plant. Unfortunately, due to normal record retention policies and lapse of time, we have little information to provide.

1. What is the nature of your business? What was the nature of you business between 1969 and 1977?

American Cyanamid Company's Bound Brook, New Jersey facility §31.11 currently manufactures bulk pharmaceuticals. From 1969-1977 the plant manufactured dyes, pigments, rubber chemicals, elastomers, organic intermediates and bulk pharmaceuticals.

2. Identify all by-products and all wastes (including, but not limited to, general plant trash, rags, cups, and masks) produced between 1969 and 1977 by your business or its predecessors. Include:

- a. the nature of each by-product or waste produced between 1969 and 1977, including chemical content, characteristics and physical state (i.e., liquid, solid);
- b. the annual quantity of each by-product or waste produced by your company between 1969 and 1977; and
- c. the process for which each by-product or waste was used or the process that generated each by-product or waste.

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No records exist pertaining to the nature of the by-products or wastes produced between 1969 and 1977. To the best of Cyanamid's knowledge, many waste streams were managed in on-site disposal and treatment facilities. In general, the waste streams are described as follows:

Intermediates Department:

§ 3.1.1.2 { 4NOX Process -  
3NOX (disposed of if it had a high btu value - some  
sold as a fuel additive)  
spent waste acid consisting of mostly sulfuric acid  
with a small amount of nitric acid

DPA Process -  
ammonia  
DPA tars

Rubber Chemicals Department:

MBT tar (Mercapto Benzo Thiazole)  
Sulfur Mercaptan  
alkaline ammonia

Pharmaceutical Department:

Isopropanol

3. Provide copies of chemical analyses performed on all wastes or by-products you generated during the 1969 to 1977 time period. If analyses from the relevant time period are not available, provide copies of analyses from the time period closest to those years and describe in detail any changes in the processes that generated those waste and by-products, which would affect the results of the analyses.

No records of chemical analyses on wastes or by-products generated during 1969-1977 are available. Exhibit A contains a list of Waste Shipments made by the Bound Brook Plant via Jonas from 1976-1978. The Bound Brook Plant went through extensive downsizing during the late 1970s and early 1980 and many product lines were discontinued.

(§ 3.1.1.1)

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4. Provide the names, titles, areas of responsibility, last known addresses and telephone numbers of all persons, including you, who between 1969 and 1977, may have:

a. disposed of or treated materials at the Site;

Cyanamid does not have records indicating that any materials were ever disposed of or treated at the Site.

b. arranged for the disposal or treatment of materials at the Site; or

Cyanamid does not have records indicating that any materials were ever disposed of or treated at the Site.

c. arranged for the transportation of materials to the Site (either directly or through transshipment points) for disposal or treatment.

Cyanamid does not have records indicating that any materials were ever disposed of or treated at the Site.

5. Describe the methods used by you to dispose of or treat your by-products and wastes between 1969 and 1977.

The majority of the by-products and wastes generated between 1969 and 1977 were treated in the Bound Brook plant's wastewater treatment system. Those wastes which could not be treated in the wastewater treatment system were shipped off site for treatment and or disposal.

6. If your response to question #5 includes the contracting of a hauler or transporter or if you have made arrangements to transport or dispose of wastes with Manfred DeRewal, Norbert DeRewal, Bruce DeRewal, Charles E. Yates, Joseph Sienkowski, George Banks, William Moran, Peter Parker, Alex Imich, John Shuman, John Barsum, Marvin Jonas, Danny Rufe, Karen Bean, Jonathan Dunn, Linda Cochran, John Bean, Kenneth Gross, Jeffrey Shaak, Richard Minthorn, DeRewal Chemical Company, Inc., Boarhead Corporation, Coastal Tank Lines, Circuit Foil Corporation, Yates Industries, East Falls Corp., Revere Chemical Company, Revere Chemical Transport, Inc., Echo Flu Company, Echo, Inc., Matlack Transportation Co., Macs Associates, Marvin Jonas, Inc., Jonas Incorporated, Jonas Waste Removal, Powers Truck Services, Inc., Chemical Leaman Tank Lines, Advanced

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Environmental Technology Corporation (AETC), Envirotech Co., Modern Disposal, Environmental Chemical Control, Inc., and/or the Algonquin Corporation, explain the arrangements and provide documentation which confirms the nature of those transactions. Identify:

- a. the person with whom you, or such other person, made such arrangements;
- b. every date on which such arrangement took place;
- c. for each transaction, the nature and quantity of the material including the chemical content characteristics, and physical state (i.e., liquid, solid) and the process for which the substance was used or the process which generated the substance;
- d. the manner in which each such waste or by-product was containerized for shipment or disposal between 1969 and 1977;
- e. precise locations at which each material actually was disposed or treated;
- f. the persons who selected the Site as the place at which materials were disposed or treated;
- g. the final disposition of each of the materials involved in such transactions; and
- h. the names of employees, officers, owners, and agents for each transporter.

Cyanamid's Eckhardt Report indicates that the Bound Brook plant used Jonas, Inc., Sewell, NJ during the period of 1974-1979. The Eckhardt Report also indicates that the Bound Brook plant also used Advanced Environmental Technology Corporation (AETC), Morris Plains, NJ during the period of 1976-1979. Cyanamid does not have any documentation regarding use of AETC. See copies of transactions between Bound Brook and Jonas attached as Exhibit B.

7. For each and every instance in which your company arranged for disposal or treatment of material at the Site, identify;

- a. the characteristics, physical state (i.e., liquid,

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solid), and chemical composition of each material;

Cyanamid does not have knowledge or documentation to support that any material was disposed of at this Site.

b. the persons who supplied you with each such material disposed or otherwise handled by you;

Not applicable.

c. how such materials were used, treated, transported disposed, or otherwise handled by you;

Not applicable.

d. when and where such materials were used, treated, transported, disposed, or otherwise handled by you;

Not applicable.

e. the quantity (number of loads, gallons, drums) of the material which was used, treated, transported, disposed, or otherwise handled by you; and

Not applicable.

f. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with you to generate, treat, store, transport, or dispose of materials at the Site.

Not applicable.

8. Provide the names, titles, and areas of responsibility of any person, including all employees, present and former, who are knowledgeable of your waste disposal practices between 1969 and 1977. Include last known addresses, social security numbers, and dates of birth for former employees.

Sidney Frankel, former Manager, Environmental Department at the Bound Brook Plant. Current address is 2 Roger Road, Edison, NJ

Norma Weston, Senior Environmental Specialist, American Cyanamid Company, Easton Turnpike, Bound Brook, NJ

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9. Provide copies of all applications submitted by you to any regulatory agencies regarding materials to be transported to and/or disposed of at the Site. Provide copies of all permits issued to you by any regulatory agencies regarding materials transported to and/or disposed of at the Site. Further, provide copies of all correspondence relating to the above referenced applications and permits.

Not applicable. Cyanamid does not have knowledge or documentation to support that any material was disposed of at this Site.

10. Provide copies of any correspondence between you any third party regarding materials transported to or disposed at the Site.

Not applicable.

11. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.

Not applicable.

12. Provide the identities of all predecessors in interest who, between 1969 and 1977, transported, stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of you predecessor in interest's business. Provide unabridged copies of all purchase agreements, plans of merger or acquisition, and any other documents implementing or otherwise relating to any change in name, ownership, or control from 1969 to date.

Not applicable.

13. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.

R. B. Tabakin, Cytec Industries, 5 Garrett Mountain Plaza, West Paterson, NJ 07424, was responsible for providing answers on behalf of American Cyanamid Company. Other persons with knowledge are:

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Norma A. Weston, Senior Environmental Specialist  
American Cyanamid Company  
Easton Turnpike  
Bound Brook

14. For each question, provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons consulted in the preparation of the answer.

See Cyanamid's response to question 13.

15. If you have reason to believe that there may be person able to provide more detailed or complete responses to any question contained herein or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, addresses, and telephone numbers of such persons and the additional information or documents that they may have.

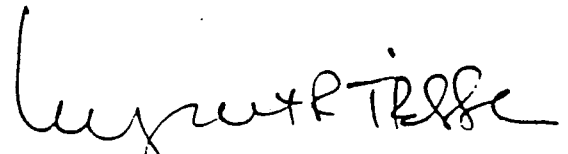
Not applicable.

16. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas of responsibility, addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

Not applicable.

If you have any questions or comments, please direct them to the undersigned.

Sincerely,



Margaret R. Tribble  
Legal Department

MRT:bm  
Atts.  
01JEMB

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BruceORIGINAL  
(Red)1 MCHM

John Meyer 6/16

101. Jack Register

Shuman 7/22 Norbert 7/9

American Cyanamid

Shuman 7/22, Mich 6/22, Bar 6/22

abco &amp; aulco

Col Abbott 5/29 Norbert 7/9

Unisys I - UNIVAC

circuit boards found on site by Zia &amp; Banks

II Burroughs:

Norbert 7/9

Bubble Circuits

Michael 6/22

Barzun 6/22

Hawk Data

abbott 5/29

&amp; Shuman 7/22

agnarox

abbott 5/29

Mallach, Inc.

- Norbert 7/9

4A7

- circuit boards w/ HAT on site visit Zia &amp; Banks

armelly (General Aniline)

VF - printed circuit boards

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